



# PACIFIC GUARDIAN LIFE

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Hand delivered

August 12, 2010

Mr. Ted Matley  
FTA Region IX  
201 Mission Street, Suite 1650  
San Francisco, CA 94105

Mr. Wayne Yoshioka  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, HI 96813

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DIRECTOR'S OFFICE  
DEPT OF  
TRANSPORTATION SERVICES

**Subject: Honolulu High-Capacity Transit Corridor Project  
Final Environmental Impact Statement/ Additional Comments**

Dear Messrs. Matley and Yoshioka:

I am writing to comment on the letter sent to the Pacific Guardian Center (PGC) from the Department of Transportation Services (DTS), City and County of Honolulu, on June 11, 2010. PGC continues to support the concept of steel-on-steel rail transit for the City and County of Honolulu. We respectfully disagree with a number of the assertions of the letter regarding the project's impacts to the Dillingham Transportation Building and the Plaza within the PGC complex. Based on a review of the FEIS, we remain concerned that the location, size, and bulk of the proposed elevated guideway and Downtown Station as well as the high foot traffic to and from the station will have significant and detrimental impacts to the PGC and its tenants as described below.

### **Impacts to Dillingham Transportation Building**

The Dillingham Transportation Building (DTB) is a National Historic Site. Any project receiving federal funding which impacts the DTB must comply with Federal Standards for Historic Buildings as administered by the Secretary of the Interior. The FEIS does not contain the signed Programmatic Agreement between the City and local consulting parties to resolve negative impacts to the DTB and other historic sites. For this reason we would urge the FTA to not accept the FEIS at this time.

The DTB is a 4-floor structure with window openings at 25, 35 and 45 feet above grade. According to the Plan and Profile drawings included in the FEIS (Appendix B, Drawing RP023), the underside of the elevated guideway would begin approximately 35 feet above grade and the parapet walls on each side of the guideway would extend to approximately 55 feet above grade, blocking a 20-foot high strip of the makai view from the building. The Downtown Station would have a roof structure extending to approximately 70 feet above grade, a mezzanine structure across Nimitz Highway 25 feet above grade and associated structures for elevators, escalators and stairways on both sides of Nimitz highway. We are concerned that the close proximity (40 feet) of the elevated guideway structure to the makai façade of the building and the equally close proximity (30-40 feet) of the Downtown Station entrance structure to the makai-Diamond Head

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corner of the building will block DTB tenants' makai views and significantly diminish the economic value of these spaces. We also remain concerned that noise impacts, particularly on the upper floors of the building, have not been adequately addressed by either the DEIS or the FEIS. Low parapet walls along the edges of the guideway proposed for noise mitigation will direct noise upward and away from ground level but we are concerned that the redirected noise will disturb and interrupt upper floor businesses and make it further difficult to attract and retain tenants in the affected spaces.

The June 11 letter indicated that the latest station entry design has been changed to direct "pedestrians approaching the entrance primarily through the Dillingham Transportation Building arcade". This represents a change from the scheme detailed in the DEIS (pedestrians walking the length of the plaza) and in our opinion creates a significant impact on the DTB. According to the FEIS (Figure 3-9), 4,690 riders are projected to enter and exit the Downtown station during the 2-hour peak period weekday mornings. We are very concerned about the impact of foot traffic of this magnitude on the arcade. Many of the ground floor tenants cater to Downtown workers for breakfast and lunch and utilize portions of the arcade for customer to sit and talk in a relatively secluded area. We are concerned that the increased foot traffic through the arcade created by the transit project will lead to a loss of tenants and rental income.

#### **Impacts to Plaza**

We have described the urban amenities and features of the plaza between the DTB and the PGC towers in a previous letter (January 30, 2009). According to the FEIS, the area of the plaza which would be appropriated for the mauka Downtown Station entrance has been increased from 2,400 sf to 3,000 sf. We have continuing concern with the DTS's assertion that the Downtown Station entrance "would not eliminate the open space or alter its use." The projected foot traffic to and from the Downtown station has been revised from 2,500 (DEIS Figure 3-10) in the 2-hour morning peak periods to 4,690 (FEIS Figure 3-9). As noted in the January 2009 letter, the vast majority of transit riders will use the mauka station entrance due to its direct access to the Central Business District. With the transit system operating daily from 4 a.m. to midnight (trains arriving every 3 – 10 minutes) we are concerned that PGC will require a significant increase in security personnel as well as maintenance staff to keep the plaza area safe and attractive for the use of our tenants. We are also concerned that with limited conveniences within the station (only one restroom, for example) transit riders will turn to PGC facilities (restrooms, drinking fountains and benches) for their needs, particularly during the afternoon rush hour when foot traffic will "bottleneck" on the plaza due to the limited capacity of the station entrance.

We are concerned that the open space of the plaza will be significantly reduced by the 3,000 sf station entrance and support buildings and that the use of the plaza will be changed from a private tenant amenity to a public thoroughfare. The water feature at the makai end of the plaza currently houses the DTB's only common trash enclosure. There is no available alternative location for a trash enclosure that is convenient to both the DTB and the 2 office towers. The water feature also screens off views of the roadway and masks traffic noise. Removal of this water feature and the landscaping behind it will open the plaza to the street noise of Nimitz Highway and significantly degrade the quality of the plaza.

#### **Recommendations**

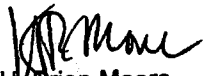
We would not have the concerns mentioned above if the project was changed to light rail transit. We strongly urge the City to consider changing the project technology from "hot" third rail to overhead or underground power wire technology. This would enable a light rail transit system similar to those in use in Portland, Seattle and Phoenix with train operation either at grade or elevated as required by local conditions. This would give the City much greater flexibility in locating stations and routes, minimizing negative impacts associated with transit in urban areas. While an at-grade route on Nimitz Highway may not be advisable, locating an at-grade light rail

system closer to the center of the Downtown on either King or Hotel streets, offers greater convenience to riders and avoids the negative impacts to the PGC detailed above.

If the mauka entrance to an elevated Downtown Station must be located within the PGC property, we strongly urge the City to shift the entrance from the makai-Diamond Head corner of the plaza (as shown in FEIS Appendix B, Drawing RP023) to the Ewa side of Alakea Street. The accessory structures needed to bring transit riders from station level to the street could be incorporated into the lower floors of the makai office tower which are used mainly for parking. Concealing these accessory facilities within the makai tower would result in significantly less visual impact to the area and allow more flexibility in the capacity of stairways and escalators. The Ewa lane of Alakea Street (used for parking) could be used for a widened pedestrian walkway and the PGC parking entrance could be reconfigured to minimize pedestrian-vehicular conflicts.

Pacific Guardian Center sincerely thanks the City and County of Honolulu for this opportunity to offer our comments and recommendations.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Brian Moore", is written over a horizontal line.

H. Brian Moore  
Asset Manager for Pacific Guardian Center